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Attorneys for Defendants  
Ladah Law Firm and Ramzy Ladah

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

DEBORAH CARROLL, an individual;	)	Case No. 2:18-cv-00960-JCM-BNW
	)	
Plaintiff,	)	STIPULATION AND ORDER TO
	)	EXTEND TIME TO REPLY TO
v.	)	SUMMARY JUDGMENT
	)	OPPOSITION
LADAH LAW FIRM PLLC; and RAMZY	)	(First Request)
LADAH;	)	
	)	
Defendants.	)	

IT IS HEREBY STIPULATED AND AGREED by the parties' counsel of record that Defendants will have an extension of time up to and including January 10, 2020 to reply to Plaintiff's Opposition to Defendants' Motion for Summary Judgment (ECF No. 31). Defendants' Motion for Summary Judgment (ECF No. 22) was filed on September 16, 2019. This is the first request for an extension of this deadline.

Since the Opposition was filed, defense counsel has been extensively working on a Ninth Circuit submission that is due November 27 and has had little time to devote to this matter. During the next month, in addition to the holidays, defense counsel has three Early Neutral Evaluations scheduled (including one in Reno), numerous other appearances and deadlines, and family obligations. While the circumstances are not identical, the extension sought is consistent with the six weeks of extra time granted to

1 Plaintiff's counsel with respect to the Opposition. (See, ECF No. 28 and 30).

2 KEMP & KEMP

FISHER & PHILLIPS LLP

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4 By: /s/ James P. Kemp, Esq.  
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6 Attorneys for Plaintiff

By: /s/ Scott M. Mahoney, Esq.  
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Attorneys for Defendants

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8 IT IS SO ORDERED:

9 James C. Mahoney  
10 UNITED STATES DISTRICT JUDGE

11 Dated: November 27, 2019  
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